

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,

Plaintiff

v.

TP-LINK TECHNOLOGY CO., LTD.,

Defendant

Case No. 6:20-cv-01012  
Case No. 6:20-cv-01013  
Case No. 6:20-cv-01014  
Case No. 6:20-cv-01015  
Case No. 6:20-cv-01016  
Case No. 6:20-cv-01017  
Case No. 6:20-cv-01018  
Case No. 6:20-cv-01019  
Case No. 6:20-cv-01020  
Case No. 6:20-cv-01021  
Case No. 6:20-cv-01022

**JURY TRIAL DEMANDED**

**CASE READINESS STATUS REPORT**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development, and Defendant TP-Link Technologies Co., Ltd. hereby provides the following status report in advance of the Case Management hearing.

**FILING AND EXTENSIONS**

Plaintiff's eleven Complaints were filed on October 31, 2020. There have been no extensions.

**DEFENDANT'S ANSWERS AND COUNTERCLAIMS**

In lieu of answering Plaintiff's eleven Complaints, Defendant, a company located in China, moved the Court to dismiss for invalid service of process under Rule 12(b)(5) in contravention to the Hague Convention (and therefore that jurisdiction is lacking over Defendant), or in the alternative, to vacate the Court's December 7, 2020 Order on

alternative service and to quash Plaintiff's alternative service

**PENDING MOTIONS**

In each of the eleven cases, Defendant, made a special appearance to contest jurisdiction, and filed a motion to dismiss for invalid service of process under Rule 12(b)(5) in contravention to the Hague Convention (and therefore that jurisdiction is lacking over Defendant), or in the alternative, to vacate the Court's December 7, 2020 Order on alternative service and to quash Plaintiff's alternative service. Defendant respectfully requests expedited consideration of its motion to dismiss.

**RELATED CASES**

There are no other related cases in this Judicial District involving the same patents, although Plaintiff has filed eleven cases in this Judicial District involving the same parties but different patents. The eleven pending cases are listed below:

- Case No. 6:20-cv-01012 (U.S. Patent No. 7,174,180)
- Case No. 6:20-cv-01013 (U.S. Patent No. 9,226,305)
- Case No. 6:20-cv-01014 (U.S. Patent No. 7,751,423)
- Case No. 6:20-cv-01015 (U.S. Patent No. 8,094,573)
- Case No. 6:20-cv-01016 (U.S. Patent No. 8,199,636)
- Case No. 6:20-cv-01017 (U.S. Patent No. 7,965,726)
- Case No. 6:20-cv-01018 (U.S. Patent No. 7,447,767)
- Case No. 6:20-cv-01019 (U.S. Patent No. 7,333,770)
- Case No. 6:20-cv-01020 (U.S. Patent No. 8,774,790)
- Case No. 6:20-cv-01021 (U.S. Patent No. 9,548,977)
- Case No. 6:20-cv-01022 (U.S. Patent No. 7,652,988)

**IPR FILINGS**

There are no known IPR, CRM, or other PGR filings.

**NUMBER OF ASSERTED PATENTS AND CLAIMS**

Plaintiff has asserted one patent in each case. Plaintiff has not yet identified the number of asserted claims, although it asserted one claim in each Complaint. Plaintiff has not yet served its preliminary infringement contentions.

**APPOINTMENT OF TECHNICAL ADVISOR**

Plaintiff is unopposed to the appointment of a technical advisor to assist the Court with claim construction or other technical issues. In view of Defendant's special appearance in this case to contest jurisdiction for Plaintiff's failure to properly serve its eleven Complaints, Defendant does not take a position regarding the appointment of a technical adviser.

**MEET AND CONFER STATUS**

Plaintiff and Defendant conducted a meet & confer conference. Plaintiff on January 8, 2021 served jurisdictional discovery on Defendant and a third party, Foley & Lardner. Defendant submits that the purported jurisdictional discovery on its motion to dismiss for improper service does not relate to any disputed fact and therefore should not delay Court resolution of Defendant's motion to dismiss. Defendant also submits that the Court defer entry of a general schedule in the eleven cases until the motion to dismiss is decided. Plaintiff disagrees and proposes the Court set the Markman and trial date in accordance with its standard procedures. Defendant is prepared to continue to meet and confer on the jurisdictional discovery and scheduling disputes and if unable to resolve them, will contact the Court for a telephonic hearing, pursuant to the instructions set

forth in the Court's November 19, 2020 "Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases." Plaintiff has indicated to Defendant that it will respond to the motion to dismiss after Defendant and Foley respond to the jurisdictional discovery.

Dated: January 11, 2021

Respectfully submitted,

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